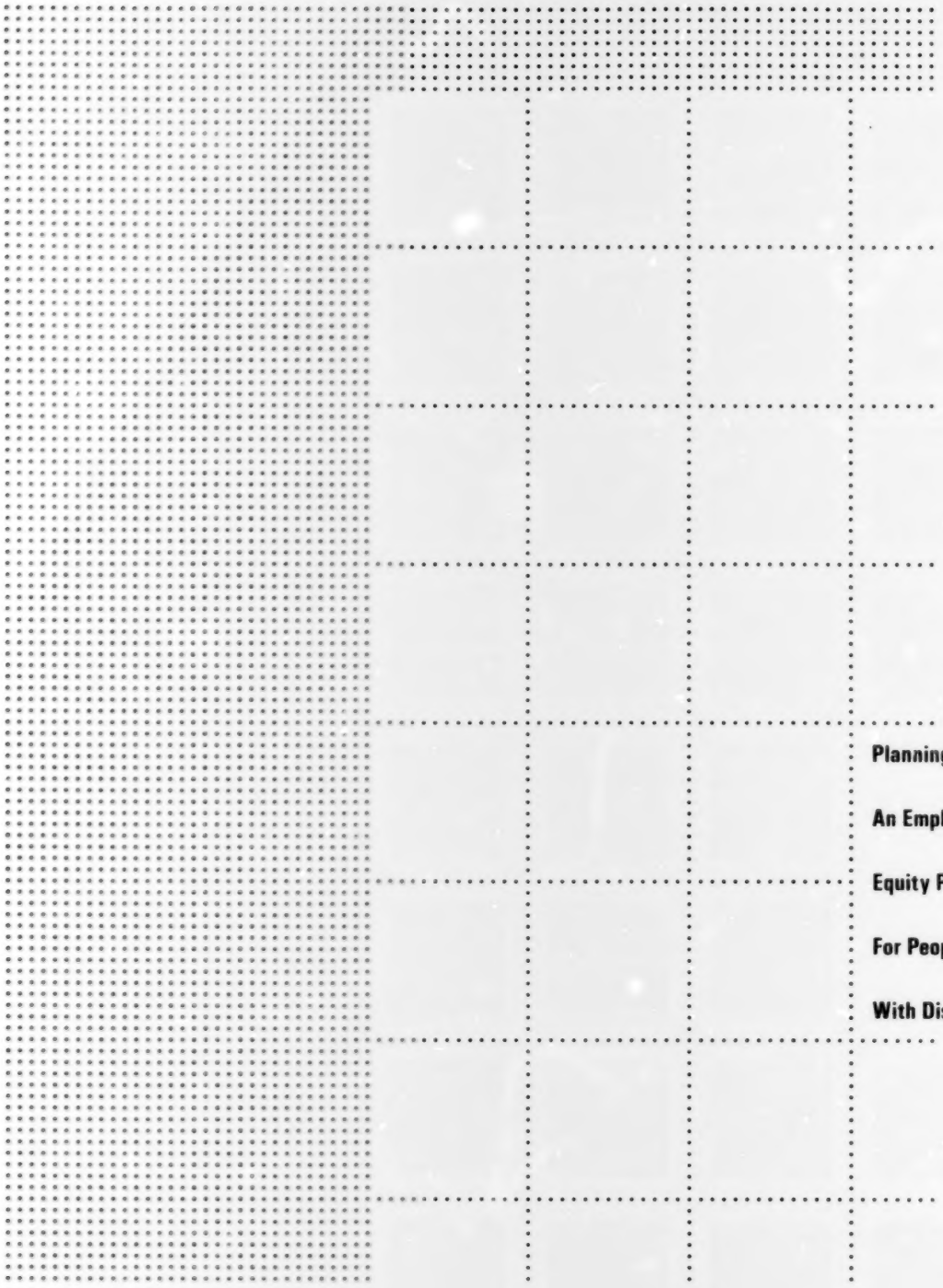
Ontario Ministry of Labour
Handicapped Employment Program

What It Takes



Planning

An Employment

Equity Program

For People

With Disabilities

87-04132/

Foreword

This planning guide has been published by the Handicapped Employment Program to provide its employer clients with a reference for planning an employment equity program for people with disabilities. Consultants are available to advise employers on their plans and to assist in the facilitation of training and awareness seminars. For further information contact:

Manager
Handicapped Employment Program
Ontario Ministry of Labour
10th floor
400 University Avenue
Toronto, Ontario
M7A 1T7

(416) 965-2321

Acknowledgements

The Handicapped Employment Program wishes to thank the representatives of business, organized labour and the community of people with disabilities, who provided feedback on this planning guide as the writing progressed. We also want to acknowledge and thank the team at the Westinghouse Consulting & Development Group who provided writing services and Assembly Communications Design for design services.

Handicapped Employment Program

October, 1986

Contents

Introduction 3

Allison Enterprises 6

It Takes Diagnosis and Action Plans 9

It Takes Policies and Practices 12

It Takes A Workforce Analysis 17

It Takes Goals 23

It Takes Communication and Awareness 27

It Takes A Facility Review 32

It Takes Pro-active Recruitment Strategies 35

Allison Enterprises Postscript 42

External Resources 44

Introduction

"Equality is, at the very least, freedom from adverse discrimination. But what constitutes adverse discrimination changes with time, with information, with experience, and with insight. What we tolerated as a society 100, 50, or even 10 years ago is no longer necessarily tolerable. Equality is thus a process - a process of constant and flexible examination, of vigilant introspective, and of aggressive open mindedness.
(Excerpt from Equality in Employment, A Royal Commission Report, 1984)

Much has been written in recent years on the topic of employment equity, or as some call it, affirmative action.

Employers have been exposed to the concept from a variety of different perspectives including:

- the target groups that a program can assist
- perceived benefits for participating companies
- rationale for participation including business and social reasons
- comparison to the American experience
- mandatory vs. voluntary programs, and
- issues that must be confronted once a commitment is made.

This guide will not address the merit of implementing employment equity as much as it will deal with what it takes to develop an effective program that makes sense given the needs of your organization.

People With Disabilities As A Target Group

What follows is a process to introduce an employment equity program for people with disabilities.

For the purpose of clarity and consistency, the definition of *handicap* contained in the Ontario Human Rights Code will be used.
(b) "because of handicap" means for the reason that the person has or has had, or is believed to have or have had,
(i) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, including diabetes mellitus, epilepsy, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a dog guide or on a wheelchair or other remedial appliance or device,
(ii) a condition of mental retardation or impairment,
(iii) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language.
(iv) a mental disorder, or
(v) an injury or disability for which benefits were claimed or received under the Workers' Compensation Act;
While people with disabilities constitute but one target group in a comprehensive employment equity program, the above definition demonstrates the need for specific actions in addressing the needs of this group, and hence this planning guide for employers.

Terminology

The term employment equity will be used to describe the concept discussed in this guide. This term has grown in acceptance and use since introduced by Judge Rosalie Abella in her 1984 Royal Commission report entitled *Equality in Employment*.

The designations *employment equity* and *affirmative action* refer to pro-active measures that go beyond *equal employment opportunity* programs.

The terminology that you accept for use in your organization is of lesser importance than the intent of your actions and the interpretation placed on them by your employees, your customers and the community at large.

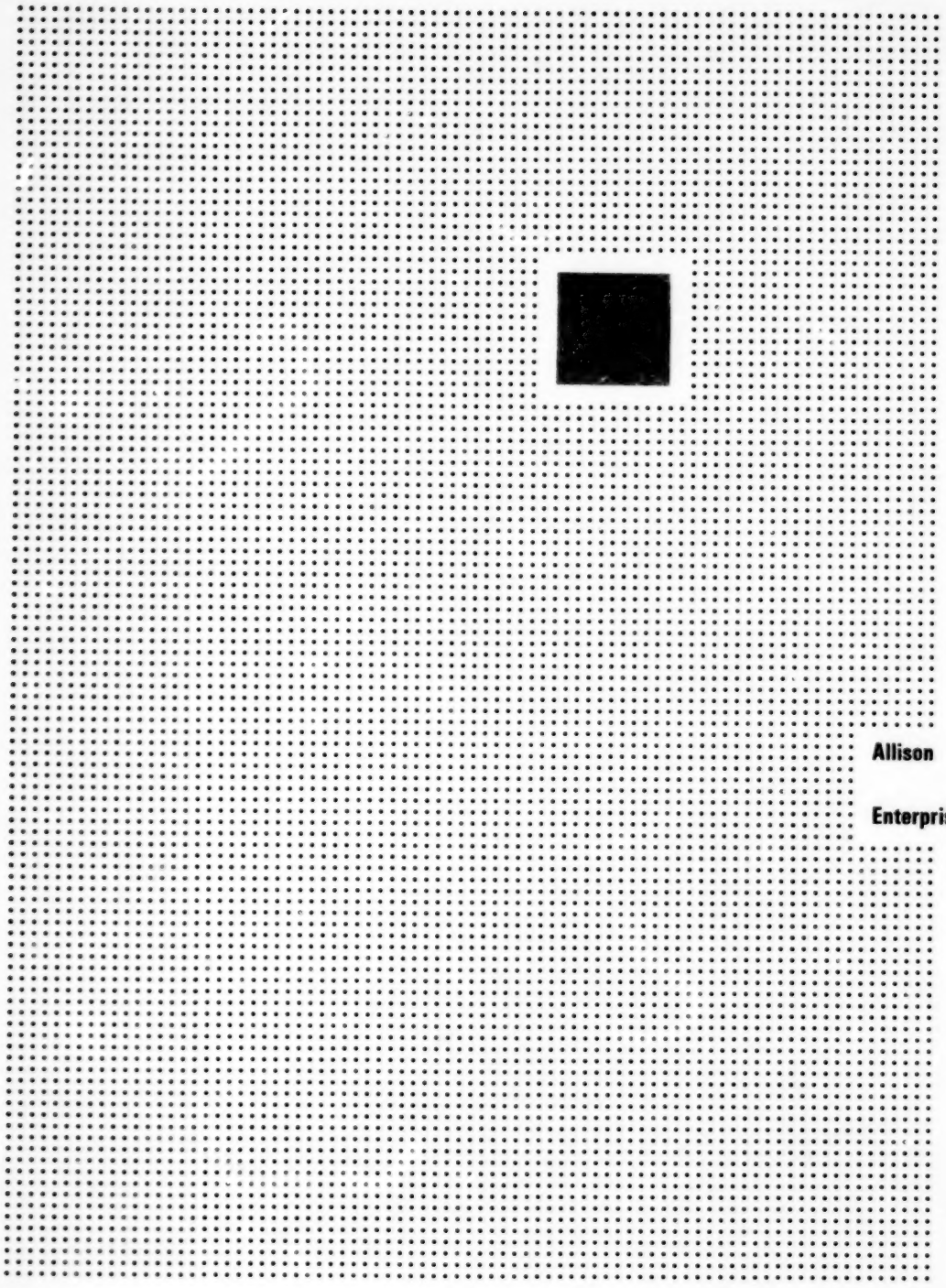
Objectives

There are three key objectives in providing this document. They are to:

1. Provide employers with a planning guide to implement an employment equity program for persons with disabilities.
2. Identify common obstacles or traps that employers may encounter.
3. Develop an understanding that action must correlate to diagnosed need in order to be most effective.

Companies will need to consider the status of their efforts to date, and the unique qualities of their organization before using and/or modifying the elements that follow.

There is no single process that, when followed, will guarantee success for all who adhere to it. It is intended however, that programs will be more successful in responding to the needs of people with disabilities when considering the steps described in the pages ahead.


Allison
Enterprises

Described by an industry magazine as a thirty-five year old success story, Allison Enterprises had caught the attention of business analysts by developing an entrepreneurial concern into a significant export venture. From its single plant in Ontario, four hundred employees now work to produce rubber products for use in the manufacturing and related service industries.

Three and a half decades of development had resulted in traditional organization demographics within the company despite its entrepreneurial beginnings. Allison Enterprises was still privately owned by the Allison family. It was run by a typical management committee that included:

Chairman (retired)
President
V.P., Marketing and Sales
V.P., Manufacturing
V.P., Finance/Administration
Director, Human Resources

At a recent Management Committee meeting, Doug Reid, the Director of Human Resources, raised the need for the introduction of an employment equity program.

The rationale for the new program was based upon four points raised by Reid:

1. The current voluntary approach to employment equity was likely the precursor to a government mandated approach.
2. Some of the company's domestic business was with municipalities that had approved contract compliance for suppliers.
3. Government relations could be improved by co-operating on this subject.
4. Allison would maintain its image as a good corporate citizen.

The President's response was as expected by the seasoned executives. He saw this as an opportunity to treat the employees fairly and take a progressive step forward. The other executives' response was less positive. They had all heard the term employment equity in the news and associated it with quotas and high cost for no real return on the investment. In short, they did not share the enthusiasm for the program that the President and Reid both exhibited.

In spite of the concern of some V.P.'s regarding the inclusion of persons with disabilities as a target group, the program was approved. It officially began with employees reading the President's policy statement on employment equity that was posted on all bulletin boards. In it, he expressed the importance of such a program to business, pledged Allison Enterprises to the concept, and identified Doug Reid as having accountability to implement the program in-house.

In time, Reid had developed an action plan based upon his knowledge and that of his assistant, regarding employment equity programs in other firms. The actions he included were scheduled for resolution in the forthcoming year since the President promised results in one year in his communique with employees.

The action plan included:

- building renovations to accommodate future employees who use wheelchairs
- an outreach recruitment program to attract applicants with disabilities
- a broad policy statement to local media regarding employment equity
- use of "Employment Equity Employer" in all advertisements for positions with the company
- regular updates in the company newspaper

As the first year of the action plan drew to a close, Reid began his compilation of data to demonstrate the success of the program.

1. Renovations were complete (ramps only).
2. Outreach had occurred.
3. Policy statements distributed to the media.
4. "Employment Equity Employer" designation in advertisements.
5. Regular updates had appeared in the company newspaper.

On the surface, the action plan had been a success. Unfortunately, only one disabled applicant had been hired during the year. That person had resigned after two months. The results for the other target groups were not much better.

The President had been meaning to bring himself up to date on how the program was proceeding. When Reid provided the facts to him, he expressed his dismay at the program results as they related to his one year objective. His single question to Reid was, "You followed your action plan and accomplished the tasks yet achieved little if anything. What does it take?"

The actions by the employer in the case study, represent a collection of actual approaches utilized by some organizations in their attempt to introduce an employment equity program.

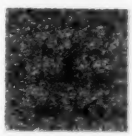
The implementation of a program is a complex task that requires careful planning and considerable commitment. Commitment that is measured by time and money.

At Allison Enterprises, several issues were evident that impeded the successful implementation of the program.

Several of these, including timing, commitment, employee involvement, job accommodations, objectives and diagnosis, were overlooked or not considered fully.

While the program was endorsed and undertaken for some valid reasons, the ensuing actions were not effective. Change did not occur.

In the chapters that follow, information is provided to assist in the implementation of a program that will result in change – information which should indicate what it takes to avoid the fate of the imaginary Allison Enterprises.



It Takes Diagnosis and Action Plans

Why Diagnosis?

Action plans based on diagnosis are stronger plans since they address specific needs that are unique to the situation or to the organization.

Companies will encounter obstacles when they attempt to implement a program "off the shelf" that deals with employment equity. In most cases, these programs are worthwhile, but do not take into account the environment or *culture* in which the program will be launched.

An employment equity program should:

1. be designed to coincide with your company's culture rather than conflict with it;
2. relate to one or more issues that threaten the culture, and therefore productivity.

Eight Step Analysis

In order to complete the recommended diagnosis and action planning for your company's employment equity program, you may wish to follow this eight step analysis:

1. Scan the environment.
2. Identify the issue(s).
3. Develop alternative solutions.
4. Evaluate the potential impact of proposed solutions.
5. Finalize action plans.
6. Establish accountabilities.
7. Implement solutions.
8. Assess results.

Involving your employees in this process is a good idea. A task force of management and employees (including trade union representatives) can carry out this analysis.

The eight steps carry with them questions that can be asked to arrive at the desired information. Examples of the types of questions that can help you to diagnose your organization follow.

1. *Scan the Environment*

- Consider the culture of your organization.
- Consider the influences in this situation.
- Consider the entire environment as well as the "problem".

2. *Identify the Issue(s)*

General

- Is this part of a broader issue?
- Have you identified the issue based upon facts or subjective intuition?

Specific

- How many of the target population are there?
- In what job(s) are they (not) found?
- At what levels in the organization?

3. *Develop Alternative Solutions*

- Consider ways to address the issue(s) that you have identified through objective diagnosis. For example, if the issue was lack of representation, alternative solutions might include:
  - internal training of target members on staff
  - bridging positions
  - outreach recruitment
  - agreement with union where represented employees are involved.

4. *Evaluate the Potential Impact of Proposed Solutions*

- Will disabled workers actually move into areas where they were previously under-represented?
- How will your other employees perceive your actions?
- Will your actions be readily measurable?

5. *Finalize Action Plans*

- Have you established specific and reasonable objectives?
- Are the objectives time bound? measurable?
- How will you monitor the action plan? How often?

6. *Establish Accountabilities*

- Who will be accountable for the implementation?
- What level is this person/these persons in the organization?

7. *Implement Solutions*

- Will these solutions result in compliance?
- Will the solutions represent a pro-active approach to outreach recruitment?

8. *Assess Results*

- Where has change occurred? Why?
- Did change occur in one area and not another? Why?
- How should objectives be modified to achieve the desired results?

In most companies, diagnosis and action planning will occur on a regular basis. Through such review, employment equity programs for people with disabilities should remain current and dedicated to addressing real issues that prevent meaningful participation of workers with disabilities in the workforce.

In the information that follows, the basic elements of an action plan will be explained to assist you in your implementation.

It Takes Policies and Practices

Why Consider Policies and Practices?

Critical to the implementation of an employment equity program is the review of policies and practices.

Few organizations, if any, can claim the absence of policies whether written or informal. They guide employees in their daily undertakings by providing a set of parameters that consider internal and external forces.

Adherence to inappropriate or outdated policies can also constitute *systemic discrimination*. This form of discrimination unwittingly prevents many persons with disabilities from participating in the labour force. It often manifests itself in comments such as:

"I can sympathize with your predicament
but our policy is very clear on that point . . .
I couldn't even if I wanted to."

For this reason, an effective employment equity program must include policy review to ensure that policies do not unintentionally have an adverse impact on people with disabilities. For organizations with one or more unions, it is recommended that the union leadership be encouraged to review their policies as well. They can have a direct impact on the success of your program and should not be overlooked.

Just as essential when reviewing policies for their applicability to the environment is the need to identify *policy gaps*. That is, areas of potential concern where there exists no policy or procedure to guide employees. An example would be a policy and procedure for reasonable accommodations for employees with disabilities. An absence of clear expectations can often result in inconsistent behaviour by individuals.

Yet another source of concern is the consideration or lack of it given to the practices that fall from policies. Your review must account for action and behaviour that results from interpretation of the intent contained in any given policy.

How?

Once a person or group of people have been given accountability for the review, first have them address the following questions:

Do we have clearly expressed policies?
Are these policies accessible to all employees?
Have they been communicated?
Are they written or just understood?
How do new managers and supervisors learn how to apply them?

The following represent some of the policies that you should review in your organization.

Recruitment

- Does a policy exist on recruitment?
- Where do we source our external applicants?
  - is it in a limited range of schools, colleges or universities?
  - is the school one that recognizes and supports the needs of students with disabilities?
- Does the policy make reference to the organization's position on hiring persons with disabilities?
- Are the interviewing sites accessible?
- Are applicants expected to pick an application up from an inaccessible office?
- Is there a policy on "reasonable accommodation"?
- Do we maintain our own bank of resumes of people who have

self-identified as having a disability. (Note: this can only be done in the context of an employment equity or affirmative action program.)

Interviewing

- Does a policy exist for interviewing?
- Are reference checks made consistently or just for applicants with disabilities? If so, why?
- Are relocation offers applied consistently?
- Are tests used? With what populations have they been validated? Sight impaired? Hearing impaired?
- Are interviewers aware of related human rights legislation?
- Does the policy clearly delineate company employment equity considerations?
- Are interviews conducted in accessible facilities?
- Are considerations included regarding communication barriers that may exist between interviewer and applicant (e.g. hearing or speech impediment)?
- Have application forms been reviewed for acceptance under human rights provisions?
- Has a physical demands analysis been completed for the job at hand?
- Are creative solutions pursued if there are questions about a person's ability to handle the physical demands of the job.
- Are medicals used in the process? At what point? Are they job related? Do they contravene human rights legislation? (Note: Medical assessments should not be made until after a written job offer is made.)

Training and Development

- Does a policy exist for training and development?
- Are employees with disabilities eligible for training under current policy?
- How are training needs identified?
- Where is training held if conducted internally? Externally?
- Is the training accessible to people with different types of disabilities, e.g. mobility, hearing or vision impairment?
- How is the policy communicated to employees?
- Is training offered only if related to current responsibilities?
- Is the financial implication the same for employees who are disabled if training cost is shared with the company?

Compensation/Benefits

- Does a policy exist for compensation and benefits?
- Is there a formal system in place?
- Is there one system for all employees? If more than one system, is there consistency in application and reward?
- How are jobs evaluated; are physical demands considered?
- Do job descriptions exist for all positions?
- Is there a physical demands analysis as part of each job description?
- Is information related to the actual tasks and responsibilities?
- Are employee benefits available to all employees; part time employees?
- Does your leave of absence policy support time off for medical considerations if required?
- Is there a chance that a qualified person with a disability could be

turned down for a job because of the way your insurance benefits work? (This is a violation of the Ontario Human Rights Code.)
- What percentage of employees injured on the job return to work? Do they return to their former job or another job? Is there a policy on job accommodation for returning employees? How many remain on long term disability?

Termination/Layoff/Recall

- Does a policy exist for termination, layoff and/or recall?
- Is there a process for counselling employees prior to termination?
- What governs the recall of employees? Seniority? Special provisions for people with disabilities?
- Are benefits continued in all or part while on layoff? For all employees?

Career Planning

- Does a policy exist for career planning?
- Is there a formal process?
- How is it administered?
- Are employees with disabilities aware of its existence?
- Who administers it?
- Are there clearly defined career paths? Do they allow people with disabilities to move through the organization?

These policies and others must be reviewed regularly to ensure that they reflect the current business environment in Ontario including legislative requirements.

Failure Traps

Some employers might review existing policy and consider the job complete once the policy binder has been considered from cover to cover. This ignores unwritten, informal policies and also ignores policy application through practices and managerial interpretation.

The review process must include practice as well as policy. Having reviewed existing policy, consider the following factors in relation to practice:

1. *"Adverse Impact."*

Does your advertising exclude groups?

As a result of past practice, some employers have included physical requirements such a height in advertisements even though it is no longer considered job related. The format of your advertisements can become well entrenched over the years.

In other cases, companies have "approved" certain newspapers for use in job advertising. It has been discovered that oftentimes, job seekers, including those with disabilities, will not know which newspapers are "approved" by business and do not as a part of normal routine read those papers, or perhaps those sections.

While you may wish to recruit persons with disabilities, your practices may be having an adverse impact on your program, ultimately sending a different message.

2. *"Objective."*

Is the policy objective in its proposed application? Have there been instances where policy content has led to questionable practice by managers?

3. *"Consistent."*
Is the policy being applied consistently by supervisors? In all departments? In all locations? At all levels of the organization? Some managers may feel that a particular policy was not intended for application in his or her plant or office but rather another part of the company.

4. *"Related."*
Is the policy related to *real need* and are managers relating action to policy? Policies may address past problems but not new ones which have occurred as a result of a change such as the introduction of new technology. A policy gap will often result in managers placing their own interpretations on workplace needs.

Systemic discrimination is most often found where a particular group suffers adverse impact because of a seemingly neutral policy or practice that was not intended to discriminate.

The key is recognizing the need for change. Organizations will diagnose overt or direct discrimination because its impact is readily identified.

Your action plan must address both direct and indirect systemic discrimination if it is to result in real change.

Another trap exists for those individuals who consider only a narrow range of policies and practices.

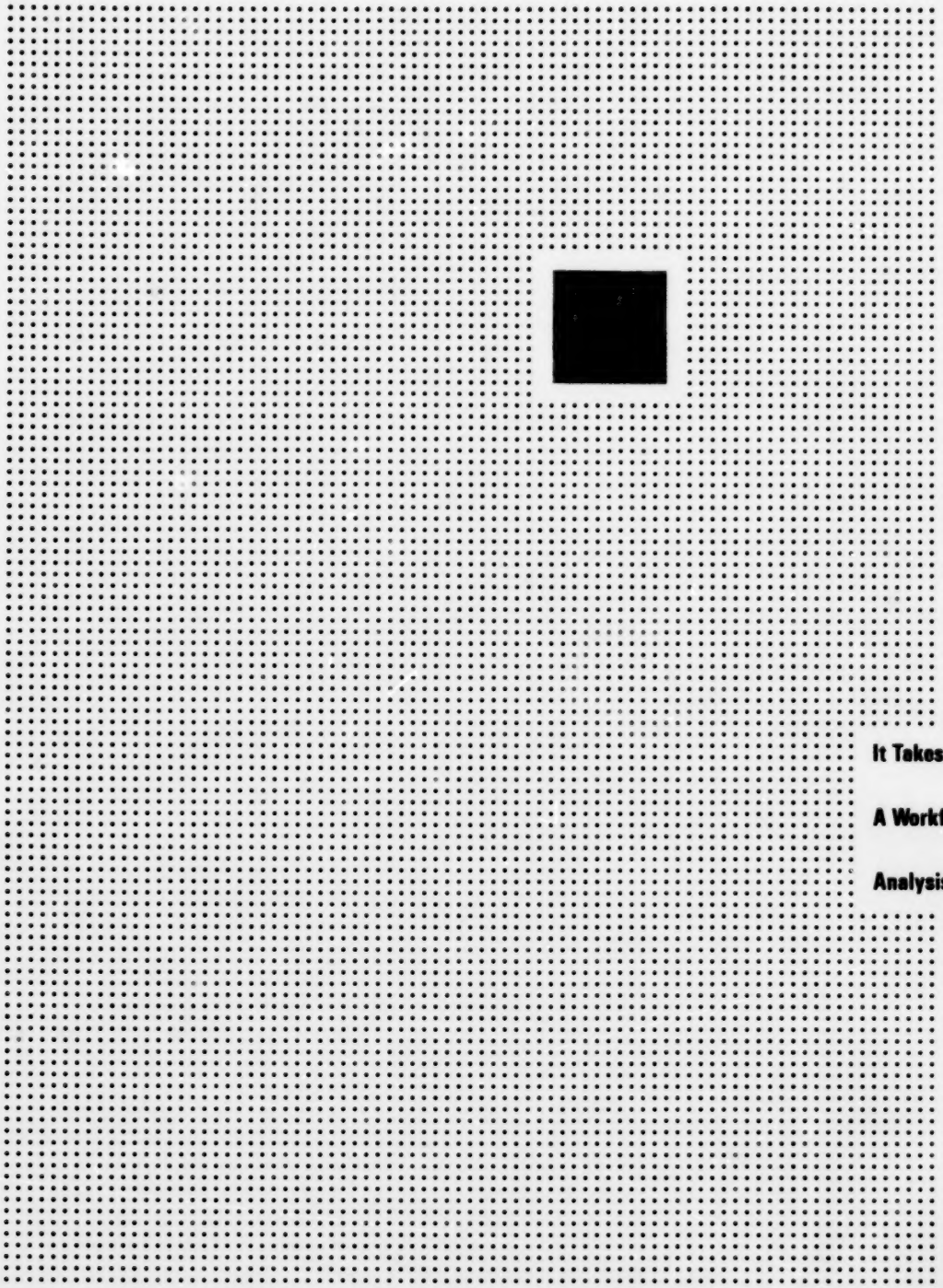
For example, checking your company policy manual has been described as an important step in your action plan. The less formal policies and practices have also been cited for their significance. But are those the only policies and practices that can impact on your success in this venture?

The review described in this step of your action plan must therefore, by design, encompass the broadest perspective possible.

Measurement Methods

The following methods of measuring this element of your action plan, are provided for information. You will undoubtedly create several more that suit your specific plan and its objectives.

- All related company policies and practices reviewed.
- Union policies and practices reviewed.
- Policy gaps identified.
- New policies prepared and approved where necessary (e.g. reasonable accommodation policy).
- Policies modified.
- Compensation inequities identified and action taken.
- Behaviour change (i.e. number of grievances).


It Takes
A Workforce
Analysis

The collection of data is essential to the measurement of change in your employment equity program. Data collection will provide you with a profile of your organization. It will therefore help you to measure what changes are happening to that profile during the course of your program. It will also be necessary when setting goals. Sophisticated software packages for computers may make the task easier, yet regardless what process is used, what remains important is your ability to track changes within your workforce. External or internal sources may ask about your organizational profile.

At some point, to satisfy internal needs of accountability, or the external requirements of a customer or legislative body, you will want to provide measurement statistics to support your efforts. It is also helpful for you to see if your action plans are working and your employee workforce is changing in profile.

Three basic requirements support the inclusion of a workforce analysis in your action plan.

1. In order to determine if there are issues, where they are and how severe they may be (e.g. concentration, segregation, under-representation).
2. To provide meaningful statistics to internal and external sources in order to measure the success of your actions relative to your plan.
3. To provide a basis for evaluation of progress.

How Are Data Gathered?

There are many ways to satisfy this element of your action plan. The alternatives range from seeking assistance from an external consultant to involving someone in your organization who is familiar with statistics. In cases where employees are represented by a union, a joint approach by union and the company would greatly facilitate this action. Such a committee could be charged with the responsibility of determining what information should be gathered and how.

However you proceed, remember that you must gain access to all relevant data in order that this objective be effectively addressed.

Data for your analysis can be categorized into two groups:

a) The raw data necessary to complete your analysis.
b) The completed analysis.

This information is required before you can analyse the status of your organization in terms of employing persons with a disability. Depending on your organization climate, there may be employees who resist your data collection efforts. In order to alleviate their concerns, it is worthwhile to ensure that employees know your objectives in collecting data. The establishment of an employee committee to complete this work or monitor what data are collected can help satisfy this objective.

Representation

You will need to identify the current representation of target group members in your current employee population. This data will enable you for example, to advise concerned parties that employees with disabilities currently account for 4% of your total workforce. Usually, data is gathered comparing target group to non-target group employees along organizational lines taking into account departments, divisions, location, or similar factors.

Distribution

Once you have representation figures, it is important to determine *where* target group members exist in your workforce. In other words, where are the 4% found? The subsequent analysis will require your looking for concentrations of employees who have disabilities in low paying jobs, low skill jobs or other clusters that suggest the existence of job ghettos. A concentration in a particular occupation might also suggest that this occupation had been identified as suitable for "disabled employees". In addition, there may exist under-representation of people with a disability in jobs of a more senior level or higher pay scale.

Compensation

You will require compensation data to ensure that those employees who have disabilities are paid equally to those that perform the same job and receive the same benefits, taking into consideration employment status, seniority, benefits, leaves of absence and so on.

In the process of data collection, you will have to review other relevant data that can impact on your current and future organization profile. Some of the data that you should examine within defined time periods includes:

- Number of new hires
- Number of promotions
- Number of transfers
- Number of terminations
- Layoffs

It is also important to identify the employment status of employees, for example:

- Part-time employees
- Contract employees

The sophistication of your data base will determine the time and difficulty confronting you in the collection and analysis of data.

Analysis will focus on concentrations of employees in low paying jobs or under-representation of persons with disabilities in higher levels of the organization.

One major element in this exercise has been avoided in the discussion to date. It also constitutes the single major failure trap in the area of workforce analysis. *Which employees or applicants have disabilities?*

Failure Traps

The issue encompasses not one but two questions:

How can you identify disabled applicants for a position?

and

How can you identify employees who have disabilities who are already employed by the company?

Most employers have honoured human rights legislation regarding requests for information about disability as it pertains to job applicants and also employees. While such legislation is still in existence, it does allow for organizations to take certain action in order to support employment equity programs.

Section 13 of the Ontario Human Rights Code deals with *Special Programs.*

"13.-(1) A right under Part I is not infringed by the implementation of a special program designed to relieve hardship or economic disadvantage or to assist disadvantaged persons or groups to achieve or attempt to achieve equal opportunity or that is likely to contribute to the elimination of the infringement of rights under Part I."

An example of a special program includes an employment equity program designed to promote the hiring and advancement of persons with a disability.

The Commission may review your program and approve it under Section 13 or require modification to qualify for designation as a Special Program. It is also advisable to contact the Ontario Human Rights Commission prior to collecting data.

How can you identify job applicants who have disabilities?

The definition of ***handicap*** in the Ontario Human Rights Code includes those with visible and non-visible disabilities.

Some people tend to focus on obvious physical disabilities when considering disabled workers. While this would serve as a ready and convenient means to identify some applicants, it would miss many more. How can you tell if a person has a learning disability or intellectual handicap from observation alone? Also for example, there are many degrees of some conditions such as Multiple Sclerosis which are not readily discernible.

There is no easy answer for the best way to collect data on disabled employee representation. Generally, ***employer*** identification of applicants who are disabled is not as effective in the long term as is ***self-identification*** by the individual. While self-identification does not necessarily result in a totally accurate internal profile, it can be more effective than other means since it places the onus on the individual.

For use with external applicants, certain organization are trying modified application forms that include tear off sections where applicants can identify themselves as matching the description of a target group member contained in the employer's employment equity plan. It is suggested that the form be approved by the Ontario Human Rights Commission and a note to that effect included on the form.

Upon completion, this form is placed in a self-addressed envelope and sealed, at which point it is forwarded to an individual where accountability rests for program data collection. Ideally, this individual would not be in the Human Resources Department. In this way, any concerns by target group members over how the data might be negatively used, can be reduced or alleviated.

The issue for most applicants is one of trust:

- Why does the employer want this information?
- Do I have to provide it?
- If I'm hired, will this disclosure inhibit my career?

One way to address these concerns is to ensure that the employee in the office where applications are distributed and completed is skilled in employment equity issues and sensitive to target group concerns.

Another is to ensure that both the company and community are aware of your employment equity program before your data collection effort begins.

While data collection is a difficult task at times, the requirement for data relating to recruitment is essential in addressing employment equity needs.

You need to know how many disabled persons were hired in a particular period of time. You also need to know how many applied and what happened to them during the process that ultimately resulted in their being or not being accepted.

How can you identify disabled employees already employed by the company?

The issue in this case for the disabled person is also one of *trust*. The questions change slightly but the potential for concern remains.

- I've been here all this time and no one has asked for this information before – why now?
- What will be done with this information if I provide it?
- Will providing this data hurt my chances to get a promotion?
- Will there be an impact on my eligibility for benefits?

Your organization must be prepared through awareness of employment equity needs and open communication of objectives so that questions such as these are minimized.

The mechanism for data collection will also change to an internal focus. In some cases, employers have distributed brief announcements that explain the *purpose, benefit to employee and company,* and *use* of the questionnaire that will follow. In some cases, employees and/or trade unions have been asked to participate in the preparation of the questionnaire. This assists in gaining support for the document.

The information may appear in the same manner as with external applicants. Employees are asked to identify themselves voluntarily as meeting some aspect of the definition provided for "disabled". Certain firms have chosen to take the request a step further and ask employees to indicate the nature of their disability specifically, or the category into which they would fall. Another way is to ask individuals if they feel they are handicapped in obtaining employment or being promoted because of a disability.

Yet other organizations begin the process by asking supervisors to identify employees that they believe meet the definition of "disabled". Upon completion of this process, a letter is sent to all employees, with the support of the union, asking them to confirm the assessment of the supervisor. This information can be helpful in assessing potential job rotations or career pathing based on physical demands and job accommodation. It can also assist when establishing priorities pertaining to physical accessibility.

Employees will not likely co-operate in such a venture where the intent of the sponsoring organization is unclear or inconsistent with past actions.

The success of your workforce analysis will depend on whether you involve employees in the process and the manner in which your program is introduced to the general employee population, and the community at large.

Measurement Methods

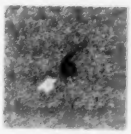
- External data collection vehicle in place.
- Applicant tear off forms returned.
- Questionnaires completed.
- Data base created.
- Participation rate defined.
- Resources committed (financial, human).
- Accurate data.

Sample

Employment Equity Data Collection
Representation and Distribution
By Occupational Group
(Permanent Staff)

	Representation			*Distribution*	
Occupational Group*	**Number of Disabled****	**Number Non-Disabled**	**% Disabled**	**% Disabled Employees in Occ. Group*****	**% Non-Disabled Employees in Occ. Group**
Upper-level Managers	0	8	0	0	1.8
Middle Managers	0	21	0	0	4.7
Professionals	2	42	4.5	10	9.4
Semi-professionals & Technicians	1	23	4.1	5	5.1
Supervisors	0	15	0	0	3.4
Foremen/women	0	11	0	0	2.5
Clerical Workers	6	30	17	30	6.7
Sales Workers	0	29	0	0	6.5
Service Workers	0	40	0	0	8.9
Skilled Crafts. & Tradesmen/women	3	56	5	15	12.5
Semi-skilled Manual Workers	3	100	3	15	22.4
Unskilled Manual Workers	5	72	6.5	25	16.1
Total	20	447	4.3	100	100.0

* Based on occupational groups cited in Abella Report.
** Refers to the number of employees with disabilities in each occupational group.
*** Refers to employees with disabilities as compared with total number of disabled employees.



It Takes

Goals

Completion of a workforce analysis will prompt the need for goal setting. However, the method and terminology used should reflect what is common in your company.

Why establish goals?

The question can be asked in any context – business, personal, social or economic. Monitoring a plan is both useful and necessary. For some however, it results in a feeling of uneasiness and apprehension. This can be attributed to the typical reaction of business to words such as ***audits***, ***monitor*** and, of course, ***quotas***. Each of these terms are regularly used in the course of normal business activities; for example, in consideration of sales performance. Yet in the context of employment equity, these words often take on a negative aspect in the minds of many people. The application of such terms in an employment equity setting would be the same as in any other setting, e.g. sales.

Measurement is also a critical component to include in an employment equity program.

Goals as part of your program will assist you in determining how your original commitment (time and money) is being supported by your action plan.

Goals vs. Quotas

There is a significant difference between goals and quotas. Quotas are a ***minimal*** level of performance that must be reached. They are usually imposed externally. Goals however provide a ***target*** which one seeks. They are established by the company.

Organizations can differ in terms of which measurement they prefer to work towards. Ultimately, the choice should be made based upon that which reflects the culture of the company.

Numeric and Non Numeric Goals

As with objectives, goals must be specific and time bound if they are to be understood and achieved with the least possible confusion.

It is also recommended that accountability for achievement of a specific goal be accepted by one person so that ultimately someone will take the necessary action to accomplish the desired result.

Goal No. 1 – This organization will implement employment equity for people with disabilities.

This goal is too broad and lacks direction regarding ***when*** implementation will begin or ultimately achieve success. It could be reworked to read as does Goal No. 2.

Goal No. 2 – This organization will implement an employment equity program for persons with disabilities by January 1, (year) and support the effort with an annual action plan designed by (position name) to assist the company to achieve full employment equity by January 1, (year).

Where possible, introduction of numeric goals will communicate clearly the expectation that a company's workforce profile will change. Non-numeric goals on the other hand, tend to focus on changing the environment within the company and support the ultimate goal which is to increase the representation of disabled persons throughout the workforce based on skill and ability.

Whether numeric or non-numeric, goals must be measurable so that you can know what progress you're making. They must also

reflect the reality of your business environment so they shouldn't be transferred from other organizations that have "done it well".

Goal No. 3 – Based on a 4% participation rate of disabled persons in electrical engineering positions in this community, this company will seek to establish a similar participant rate in this occupational area by June 30, (year).

The goal is ***numeric*** in that a guideline has been introduced relating to the community in which the business exists. "Community" can also refer to the area where the company recruits as a matter of course. Organizations may have difficulty determining the workforce participation rate in a geographic area. The availability of such data is not always readily at hand. Consult with Statistics Canada, educational institutions, and local placement agencies for disabled people to determine if specific numbers are available.*

Goal No. 4 – All position descriptions will include a Physical Demands Analysis by August 1, (year).

While the goal is not numeric, it is designed to ensure that one more necessary action be taken by a specific date in order to prepare the environment for employment equity.

If your organization was experiencing a downturn in business, it would be unrealistic to establish a goal that ten persons with disabilities be hired during the next six months.

More realistically you might establish some goals that would prepare the environment as with Goal No. 4 cited above. The additional examples of numeric and non-numeric goals may help to give your organization and its plan, a pro-active focus.

Numeric Examples

- Participation of persons with disabilities in the engineering, sales and assembly occupational categories will reflect community participation rates by January 30, (year).
- Recognizing under-representation of persons with disabilities in our workforce, 10% of those students hired this year as a result of campus recruitment should be members of the disabled community.
- 5% (based on community data) of those students hired for summer employment this year, should fit the Ontario Human Rights Code definition of "handicapped".
- 3% of those persons hired on a temporary contract this year should be members of the disabled community.

It is important to understand, that in the cases cited above, the individuals hired would possess the qualifications and ability to perform the job thereby satisfying the goal of all employers to identify and recruit *the best person for the job.*

*One source of information is "Method for Estimating the Availability of Disabled Persons in the External Labour Market", available from Human Resources Planning Division, Staffing and Management Programs Branch, Public Service Commission, 300 L'Esplanade Laurier, Tower West, Ottawa, Ontario K1A 0M7 (613) 993-5211

Non-Numeric Examples

- Establish co-operative education work stations for students with disabilities during the first quarter of (year).
- All employees of this firm will attend an employment equity awareness session within the next 24 months.
- Commencing in (year) the Performance Appraisal System will include annual measurement of managers and their success in achieving employment equity goals.
- Identify government incentive programs for hiring persons with disabilities within the next two months and participate in at least one by year end.

These time-bound goals provide accountable individuals with clear expectations. Furthermore, they provide your organization with the opportunity to make real strides in the area of employment equity and ultimately satisfy your initial reasons for participation.

Failure Traps

- Organizations that establish goals without diagnosing needs in their organization will achieve little success. Goals as with action plans must relate to the unique needs of your company and be communicated in a way that is consistent with your business practice.

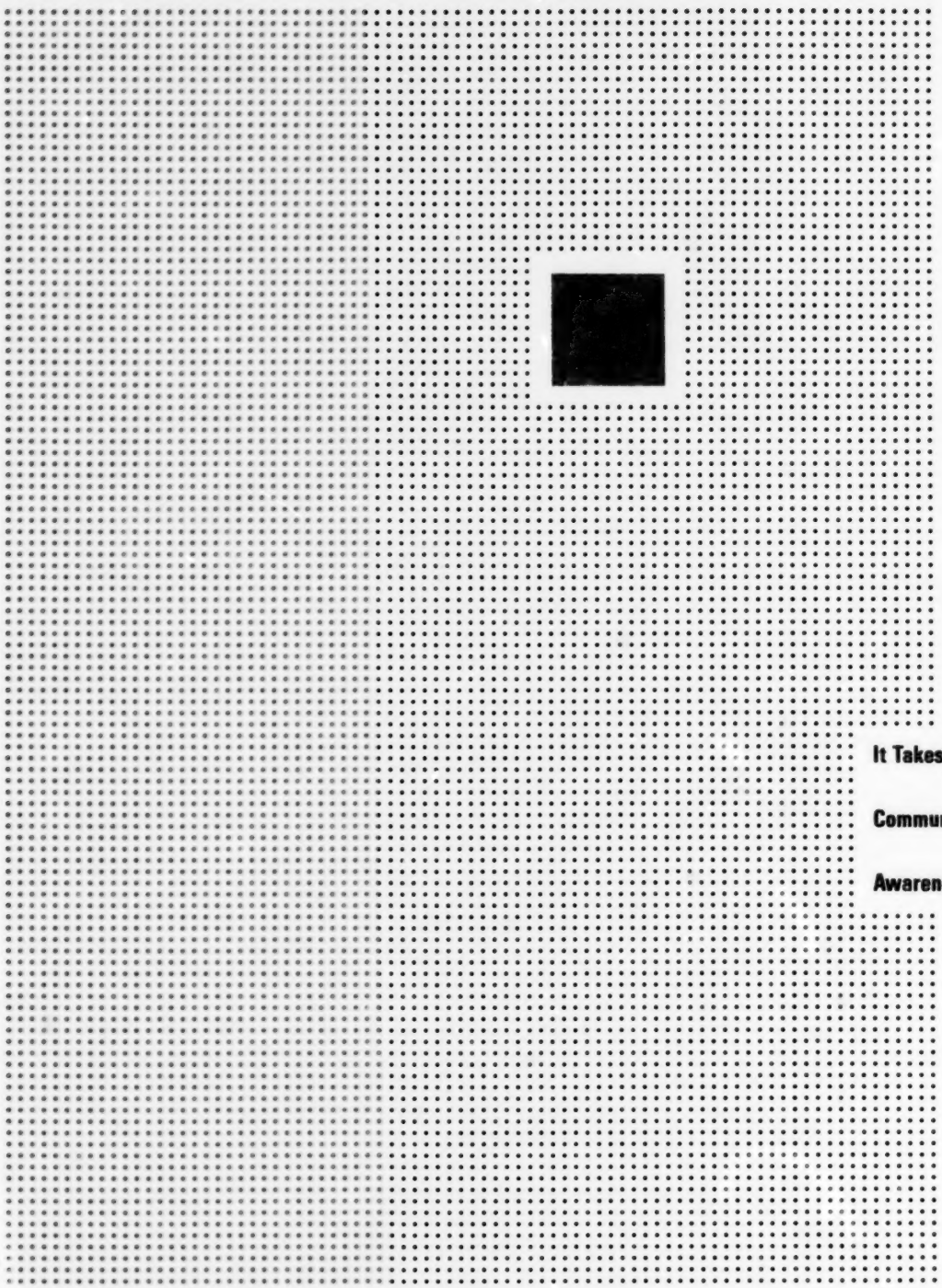
One company that undertook to create a set of goals for its program, found that six or eight were adequate for immediate attention. Unfortunately, the goals were vague and contained no expectation regarding timing. Furthermore, there was no accountability established – it was assumed that the employment equity committee was doing it without establishing specifically who on the committee was responsible. The result? Little action other than meetings, and no change in the organization that would support the needs of persons with disabilities.

No individual felt any sense of urgency regarding achievement of any goal and indeed, no sense of urgency existed as far as the employee population could determine.

In short order, the goals were re-worded to strengthen the intent, clarify time constraints and specifically indicate overall accountability for an individual.

Measurement Methods

- Goals established and communicated.
- Goals achieved.
- Goals achieved on time.
- Accountabilities in place.
- Action plan prepared.
- Actual vs. planned.



It Takes Communication and Awareness

An important element of your employment equity plan is a communication strategy coupled with education and awareness. The benefit of participation can be significant. Just as the terms quota and audit can scare the most experienced managers in the context of such a program, so can the term disabled be misconstrued if individuals are not allowed education regarding the participation of qualified persons who may also possess a mental, physical, emotional or learning disability.

A Communications Strategy

The greatest foe of employment equity is *poor communication*. This could mean a lack of communication or it could mean ambiguous communication.

Change will often be met with resistance if employees are not made aware of:

a) the issue and why it's an issue
b) the desired result in terms of goals and objectives
c) the strategy and process to achieve those results

Employees will form attitudes rapidly based on their acceptance of the issue as real and the desired result as necessary.

An employment equity program for people with disabilities is most readily understood to be a socially or morally proper thing to do, however, managers and employees will not always consider it to make good business sense (which it does). Regardless of how fair the program may be, a typical reaction is: *How will this affect me?*

How do you ensure proper communication?

Your primary objective is to inform employees with the facts surrounding the rationale for your participation in an employment equity program for people with disabilities.

Your preparation of the environment within your organization will be critical to the success of your program, and the disabled employees that work for you now or in the future.

As part of your action plan, it is advisable that you have a communications strategy that allows for a demonstration of senior management commitment and for dialogue between employees and those in positions of authority, including those with accountability for the implementation of the program.

Senior management commitment can be demonstrated in the form of a letter to all employees, a speech, or an article in the company newsletter (or all three). You can communicate the goals of the employment equity program, and provide for two way communication, by holding employment equity workshops for managers and employees.

As an example of how these actions might be undertaken, the following general comments are provided. Once again, the nature of your organization's workforce profile and culture will dictate which actions you undertake, when they must begin and what is contained in each by way of information.

Employment Equity Workshops for Managers

This element of your action plan is intended to provide a detailed overview for those individuals who will play a key role in your program. The workshop could include information such as:

- Employment equity definition
- Legislation relating to employment equity
- Historical perspective of employment equity
- Human Rights
- How this organization will address it
- Rationale for our participation
- Potential benefits
- Company action plan and strategy
- Issues

Those who attend should leave the workshop with both a keen awareness of the issues and the program strategy and a sense of how they can support the process. Bear in mind when you consider including such an element in your action plan that for the majority of your organization's decision makers, employment equity is a new concept.

As a clear indication of commitment to the undertaking, the first attendees for such a program should be the senior individuals from both management ***and the union***.

Employment Equity Workshops for Employees

The intent of this element in your program is much the same as that of the workshop just discussed. The two points of primary difference between them are ***duration*** and ***audience***.

These sessions are intended to serve the needs of ***all*** employees not just managers or those who have direct involvement with implementation of the action plan. For this reason, the degree of awareness or complexity and detail of information shared need not match that contained in the workshop.

It is important that all employees have the opportunity to hear about their employer's reasons for undertaking a program to increase participation of persons who have disabilities. It is equally important that this information be shared in a manner that allows for two way discussion. A notice on a bulletin board is one means to provide immediate information, however a follow-up session such as this allows employees to voice their concerns and more importantly, for the organization to address them.

The duration of such a session could range from thirty minutes to one-half day. The time spent will depend upon the need of your organization to prepare the environment.

Awareness Activities

Beyond an employment equity communications strategy, you will need to undertake awareness and educational activities which can include:

- Management and supervision skills seminars
- Poster program
- Film series
- Internal newspaper/newsletter column
- Sensitizing sessions
- Consumer advisory panel

Management and Supervision Skills Seminar

The topics covered by this seminar can include:

- attitude awareness
- physical demands analyses
- outreach recruitment
- interviewing
- technical aids and job accommodations
- management and supervision issues
- government incentive programs

This seminar is useful for managers who wish to understand the general considerations involved with the recruitment of persons with disabilities. The content addresses attitudes as well as imparting practical skills.

Poster Program

Through a poster program, you can identify potential employee concerns and address them in a positive yet non-threatening manner. In brief, deal with the myths associated with employing disabled persons in such a way that an individual employee is not made to feel the pressures of a majority of his or her peers.

An example of what you might put on a bulletin board would read as follows:

Myth: If a person has a disability, he or she won't have the strength required to do the job.

Fact: Never make assumptions of what people can and cannot do. There are many types of disabilities such as hearing impairment that would not impact on one's physical strength. Where strength is a factor, reasonable accommodation can be made to allow an employee to satisfy the requirements of the job.

Once you have prepared a number of such myths and research factual answers, you may change the message on your bulletin board regularly. It is important however, that the data contained on these boards is brief, clear and factual, enabling easy comprehension and acceptance.

The poster area on your bulletin boards may also be utilized to communicate other points of interest relevant to your program.

Film Series

Employees who privately might not support all facets of a program based upon a preconceived notion or attitude might be well served by attending a lunch time film series that is offered once or twice a week on the company premises.

If possible, it is advantageous to have an employee run the film who is knowledgeable and prepared to discuss questions pertaining to the film at the end of the viewing. It is most effective, if the employee is a peer of the majority of the people in attendance. You may wish to consult the resource section of this guide for organizations that could recommend suitable films for such use.

Internal Newspaper/Newsletter Column

If your organization has one, awareness can be reinforced through regular information sharing in a column or article in your newsletter or newspaper.

Progress or recent developments in your program can be shared in this manner, underscoring the fact that employment equity is one more element of your company's profile.

Sensitizing Sessions

Such sessions can take a number of forms. A worker with a disability can share their experience directly with employees. What reactions have they encountered? What has been most difficult? – humourous? – stressful? What support have they (not) received? Such a session would have to be handled in an extremely sensitive manner. The objective of such sensitizing sessions is to give employees a better understanding of some of the issues that persons with disabilities encounter in a work environment.

Consumer Advisory Panel

An innovative source of awareness for employers is a *Consumer Advisory Panel.*

Such a group is composed of individuals with a range of disabilities. This is an advisory panel from outside your organization, that can offer you insight into the changing needs of the target group, access to pertinent information and networks, and through feedback, an effective sounding board for your own action plan. It can also serve as an excellent source for your outreach recruitment efforts.

Establishing such a panel can take time and requires that your organization make a real commitment in terms of accepting constructive criticism and encouraging openness.

Some issues that you should consider when establishing such a group include:

- Mandate/authority
- Finite or indefinite life span
- Membership (external)
- Membership (internal)
- Reporting relationship
- Size
- Compensation
- Meeting regularity
- Chairperson
- Issue generation

Other issues will surface given the needs of your program.

Failure Traps

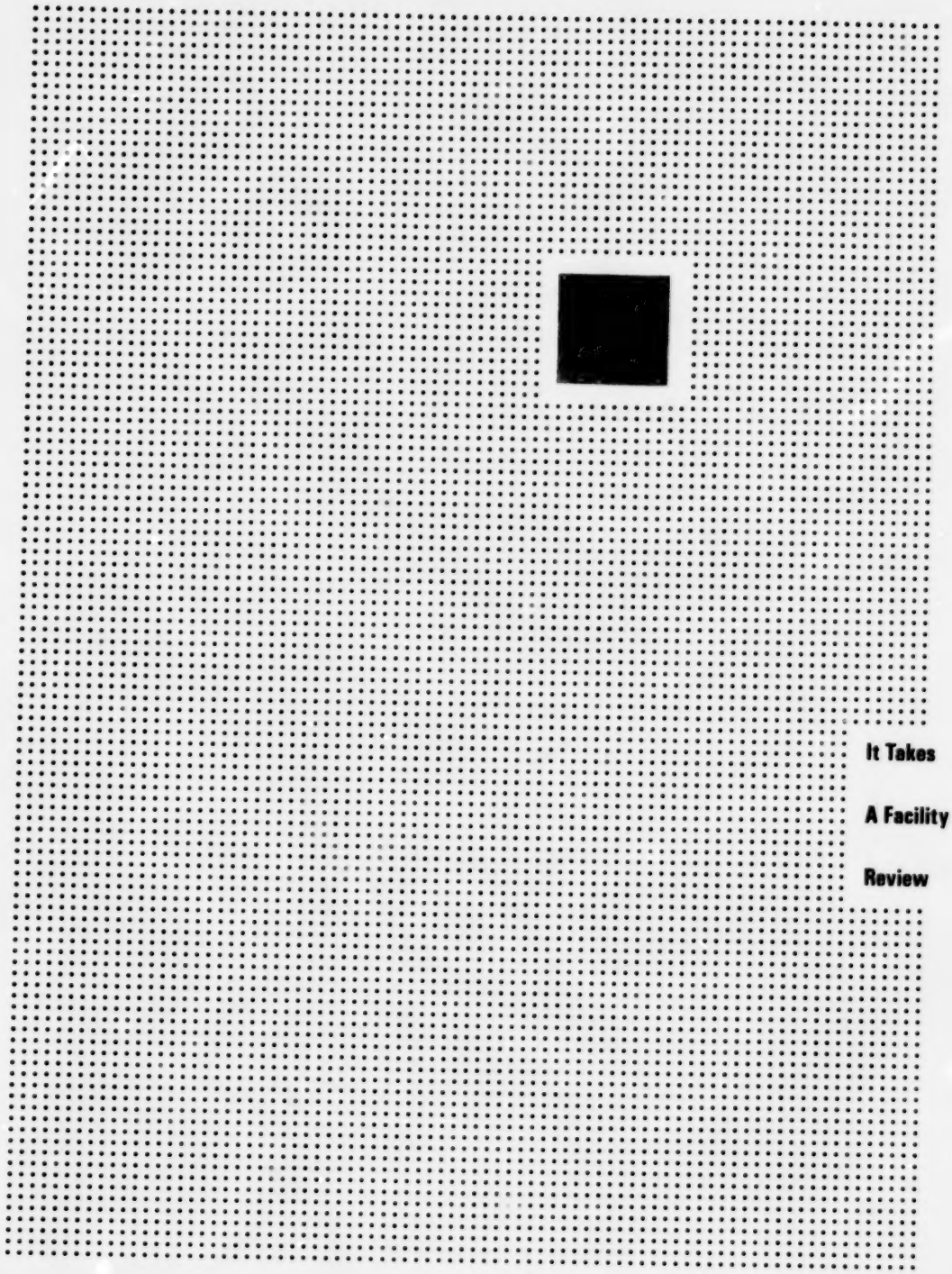
Given the time commitment for both the workshops and awareness sessions, some companies might be reluctant to address the communications and awareness issue in such a format. Other organizations have not involved *all* employees in such discussions, due to the fact that few are directly involved in the implementation.

One organization that recruited a significant number of target group members found that the state of unpreparedness amongst their employees was extreme. The uncertainty that ensued resulted in general lack of support for both the program and those members of the target group that were hired.

The program was ultimately revised to include a major awareness component.

Measurement Methods

- Number and type of workshops or sessions held.
- Number of employees attending workshops.
- Type of feedback received on workshops.
- Poster program established.
- Consumer Advisory Panel established.
- Number of films offered in series.
- Number of human rights complaints.
- Number of grievances.


It Takes
A Facility
Review

The issue of facility review or accessibility study can translate rapidly into images of sizeable capital investment, even though costs are generally exaggerated. Many organizations that exist in older premises or leased facilities feel constrained either through cost considerations or lack of control. Yet accessibility is not an issue confined to those organizations undertaking an employment equity program for persons with disabilities. Companies must face this issue when an existing employee is injured on or off the job, resulting in a physical impairment.

Actions taken to establish a suitable environment will often benefit all employees rather than only those who have a specific disability. The issue remains the same. How can companies provide a safe and accessible working environment in order that the best employee for the job can do the job?

There are a number of considerations.

Accessibility Review

As with the entire program, it is important to determine if there is an issue, what its scope is, and where it exists.

Reviewing your facility for the purposes of determining accessibility is clearly not a task for an untrained person. The requirements for employees with disabilities depend on may variables that most employers are not sufficiently trained to understand. The task is made easier if you consult with persons with mobility, vision or hearing impairments or with an agency such as the March of Dimes or the Barrier Free Design Centre in Toronto. Architects are also developing expertise in this area.

One employer, having taken occupancy in a two month old downtown office tower in a major Ontario city, requested an external consultant to review building accessibility as part of its employment equity program action plan. Following a brief, two hour preliminary review, the consultant offered a list of four pages of changes that would be required to ensure full accessibility to the broadest number of disabled persons. These included washroom alterations, height of elevator buttons, layout of coffee station equipment, evacuation routes, visual stimulant for fire alarms and many others.

While this might seem disheartening, the employer recognized the severity of the issue and was in a position to negotiate with the building's owner regarding modifications. Had the employer owned the facility, it would have been appropriate to determine which modifications were most immediate in importance, and then prepare a multi-year capital expenditure program to correct the situation.

Not all modifications are costly however, and can be completed expediently and with little disruption to employees.

As an example, where the height of a desk does not permit easy use by an employee in a wheelchair, the height can be increased by safely securing blocks beneath each leg to accommodate the employee.

Whether you are redesigning an existing facility to make it barrier free or designing a new facility, your actions should include consideration of the physical attributes of your plant or office. Listed below are some of the points that you will review to ensure that a qualified applicant or employee is not being denied access.

- Parking
- Ramps

- Entrances/Exits
- Washrooms
- Elevators
- Stairways
- Floor Surfaces

Safety

Your action plans that review facilities and accessibility will also consider safety. Increased safety in the workplace benefits all workers.

In regard to fire safety, for example, it is important to review facilities in terms of the ease with which one can exit during an emergency.

Action planning should focus on safety issues that pertain to all employees recognizing the special needs of certain employees with disabilities. Given the diverse nature of disabilities, it is most helpful to involve workers with various disabilities in this stage of your program to identify potential problems for action and correction. Your local fire department should also be able to help you with this aspect of your plan.

Government Incentives

Some government incentives are available to employers who wish to address facility accessibility as it relates to employing persons with disabilities. These grants normally relate to the needs of a specific individual or situation. In addition, there are several organizations that provide professional assistance in this area for a nominal fee or no fee at all.

Failure Traps

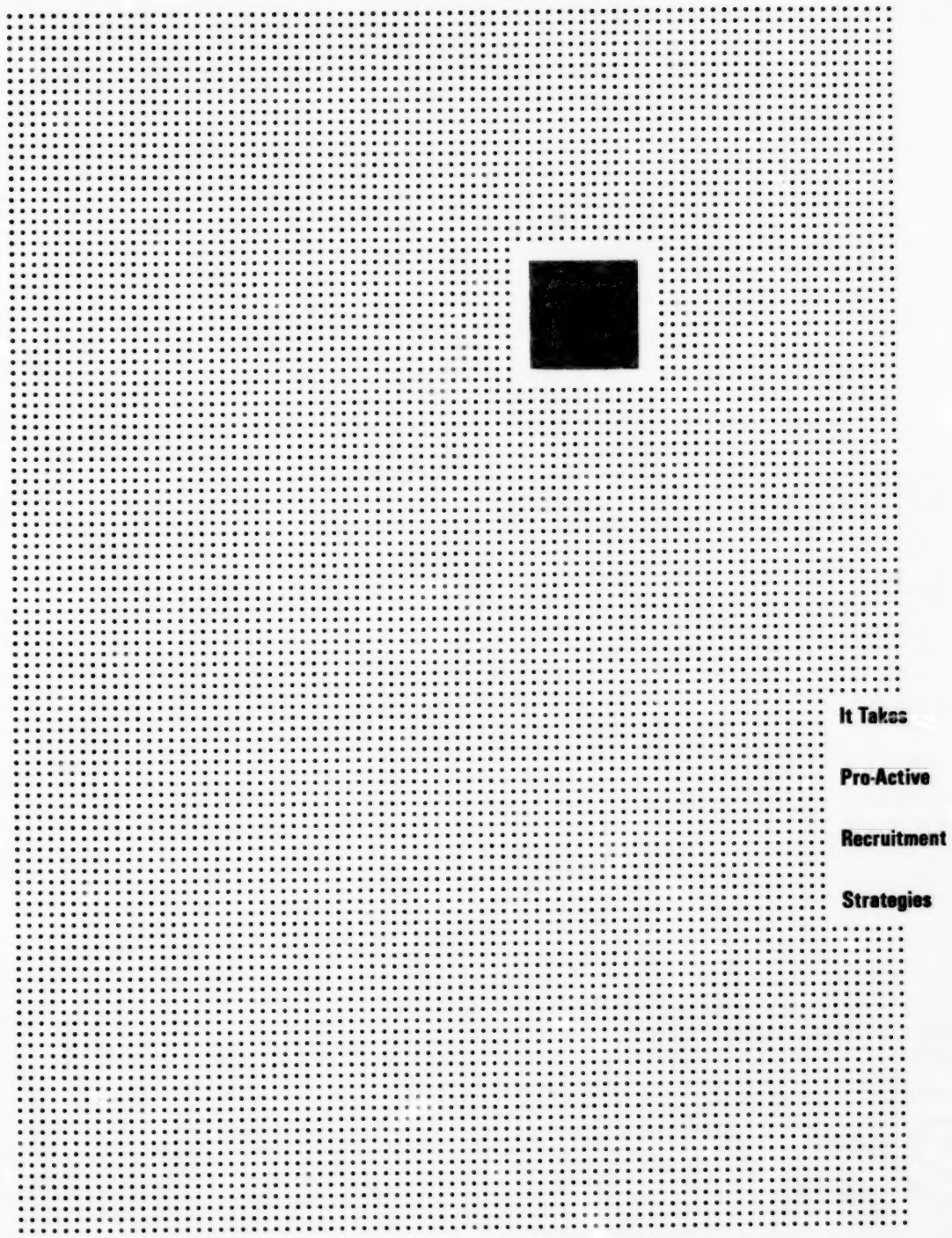
Given the relative complexity of facility review, some employers choose to procrastinate or alternatively, take swift action on certain items that have not resulted from effectively diagnosing their situation. For example, an employer might spend $10,000 to install ramps in a facility only to find that the ramp doesn't meet the needs of people who use wheelchairs. For example, its slope may be too great or the railings inappropriate. Getting the right advice is critical.

This example is not far-fetched. It happens too often and illustrates the need for employers to consider things like the following before undertaking physical changes to a facility:

- getting expert advice on specifications
- getting input from potential users
- immediate need
- long term need
- cost
- benefits to employees and public
- safety
- government incentives
- conformance to Ontario Building Code Standards

Measurement Methods

- Facility review completed.
- Target group input.
- Immediate changes complete (related to diagnosed need).
- Emergency evacuation plans approved and distributed.
- Multi-year capital plan approved.


It Takes
Pro-Active
Recruitment
Strategies

The following aspects of recruitment will be discussed in this chapter.

1. Physical Demands Analysis
2. Outreach Recruitment
3. Interviews
4. Technical Aids and Job Accommodations
5. Employment Opportunities

Each of the five dimensions of recruitment reflect objectives in an employment equity action plan.

Physical Demands Analysis

A physical demands analysis enables employers to make decisions based on fact rather than intuition pertaining to the physical requirements of a job. Objectivity and fairness in recruitment is critical. An employment equity program action plan should have as an objective, the development of a Physical Demands Analysis (P.D.A.) as a regular part of each position's description of responsibilities.

The physical demands analysis enables employers to determine the physical and environmental requirements of specific positions. Such information becomes a standard feature of the position description, thereby providing a more complete overview. A P.D.A. should be completed for all positions as a regular element of your personnel system. In this way, it is not something that you do only when considering an applicant or employee with a disability.

P.D.A. can be completed by an individual in your own organization after only one or two hours of training by a representative of the Handicapped Employment Program of the Ontario Ministry of Labour. Should you at any time require a more detailed assessment, you could request that an occupational therapist or ergonomist review a specific position.

Note: For a discussion of assessment of physical capabilities refer to: *Job Matching: The Assessment of Individuals for Work, A Discussion Paper,* prepared for the Handicapped Employment Program of the Ontario Ministry of Labour by Abt Associates of Canada.

Outreach Recruitment

The need for pro-active recruitment measures is fundamental to any employment equity program. It isn't enough to diagnose your organization's needs, establish an action plan and prepare the environment for participation of disabled persons. It is imperative that these actions be followed by a conscious effort to make your actions known to persons with disabilities in communities where your recruit, in the most effective way possible.

Including an employment equity notation in your newspaper advertisements when accurate to do so, is a beginning but by no means an end.

If you have taken steps to change your environment to ensure that participation is not only possible but welcome, you must communicate that.

There are several ways in which you might spread the news of your activity and willingness to consider qualified applicants for jobs:

1. Contact local service agencies and other organizations of or for disabled persons in your community and invite them to a session where your needs and expectations are discussed.
2. Contact provincial and federal government offices that have responsibility for placement or related activities.
3. Advise executive search firms, employment agencies and union hiring halls that you welcome applicants with disabilities.
4. Advise colleges and universities that when you recruit on-campus, you would like local associations or clubs for students with disabilities to be advised. (Colleges and universities have contact persons for disabled students.)
5. Notify school boards, especially those that have established co-op programs, that you would welcome applications from students with disabilities for jobs that you have identified.
6. Consider employees of your organization who are not at work because of a disability. (Can a reasonable accommodation be made to get them back to work?)
7. Place a general advertisement in a local newspaper, a specified number of times each year, aimed at attracting persons with disabilities. Several organizations of and for people with disabilities publish newsletters. A similar advertisement could be placed in these newsletters.

If using a placement agency, ask about pre-employment readiness activities they may have used with job-seekers. Evaluate them against your needs and ask if the agency is available to provide counselling *after* placement if required to assist the person in becoming accustomed to the new work environment.

There may be other actions that make sense given your location or the nature of the business you are in. Bear in mind that outreach should be undertaken in such a way as to achieve immediate as well as long term response. Ensure that your employment equity program has progressed to the point where your outreach efforts will be effective. Make your actions time bound and specific.

Interviews

The interview is the first time an applicant and potential employer meet. It is normally a time of nervousness for the applicant, and in the case of an applicant with a disability, it can be a time of nervousness for the interviewer.

Those employees responsible for interviewing applicants for positions within the organization must be knowledgeable in employment equity issues and the implications of the Ontario Human Rights Code. Where the employer is federally regulated, the Canadian Human Rights Act must be adhered to.

Critical factors include:

- Never assume what a person cannot do.
- An interviewer should not conduct an interview based upon stereotypes pertaining to disabled persons. (e.g. "People with disabilities are probably unreliable." or "I can't imagine a deaf person working here.")
- The interviewer should provide comprehensive information about the nature of the work. Use of a physical demands analysis provides the interviewer with job related information which can be used to determine the physical capability of the individual to perform the job. Questions related to physical demands should lead to a discussion of technical aids or job accommodations if they are necessary.
- Interviews must be conducted on the basis of job related questions only. (e.g. A question like, "Has your emotional disability ever affected your ability to make oral presentations?", is unwarranted if oral presentations are not a legitimate part of the job.) At the same time, questions pertaining to a person's limitation *as it relates to their ability to do the job* are appropriate.
- Medical assessments should not be conducted until after a written job offer is made (consult with the Ontario Human Rights Commission for further information).

These, and other examples that could be provided, demonstrate the need in an action plan for clear communication of company expectations. Interviewers must understand the goals of the employment equity program and conduct interviews in accordance with these goals.

Technical Aids and Job Accommodations

Modification of a specific job or the equipment associated with that job, should be considered a standard part of your human resource management process. Accommodation is a range of adaptations or adjustments that may make a work site or a job more suited to the needs and abilities of a worker with a disability.

Employers at times overlook accommodations or technical aids since they perceive them as too costly. They may also assume that all employees with disabilities will require accommodation when

probably fewer than 20% do. A 1982 U.S. Department of Labour study entitled *"Accommodations Provided to Handicapped Employees by Federal Contractors"*, found that among 367 firms representing 512,000 workers, 19,200 were known to have a disability. For those who required them, 51% of the accommodations cost nothing; an additional 30% cost less than $500. Only 8% exceeded $2,000. Interestingly enough, the single most important factor cited by employers in opting for an accommodation was that it attracted dependable workers (24.5% of respondents). This was followed by compliance with the U.S. law (9%), improved safety (8.4%) and improved productivity (8.2%).

All employees should expect that the employer would be willing to make reasonable accommodations or provide them with technical aids to facilitate more effective and productive activity.

The case is no different for applicants with disabilities or employees who seek to return to work following an injury on or off the job. Flexibility is the key. Some firms allow injured employees to return to work and operate at a lesser capacity in order to remove the employees from Workers' Compensation or Long Term Disability programs.

It is usually advantageous to retain an experienced employee by making a job accommodation. The high cost of training a new employee can be avoided in such cases. With regard to new applicants, interviewers and personnel staff should be aware that:
a) technical aids and accommodations are appropriate tools given human rights considerations and the employment equity policy of the company; and
b) technical aids and accommodations exist in a variety of forms that can enable a disabled person where there need be no obstacle.

For example, if a person with a disability was found to possess the skill and ability to perform the essential but not all of a job's responsibilities, you should:

- consider redesigning the job to reflect what is actually essential and what could be handled best in another area;
- consider having another employee trade certain tasks with the employee who has a disability if productivity was well served;
- introduce a technical aid to assist the employee with a disability to perform the job (e.g. equipment or other adaptive device).

In a case where an applicant, who has been labelled mentally retarded, is under consideration and an accommodation is required, such as extended training, the issue could be how to undertake such an action not whether to do it. If the person was referred by a placement agency, one of the counsellors would likely assist the employer in taking the appropriate action, such as providing a job coach in this instance.

The key, as stated, is flexibility. Your program's action plan should address technical aids and accommodations as they pertain to recruitment or promotion or transfer.

You can become creative when undertaking recruitment as it relates to your employment equity program. Certainly, recruitment can be considered in the more traditional sense. That is to place an advertisement for a specific, full time job and hire accordingly. Or you can take some of the steps mentioned earlier.

However, there are some other steps you can take if you wish to be fully proactive in opening up job opportunities for people with disabilities. Some disabled people have not had the same training and summer job opportunities as everyone else. This may lead to situations where they need training and work experience to become fully competitive for permanent employment. The provision of internships, summer, temporary, co-op and part-time jobs will begin to address this issue through your employment equity plan. You can also undertake many of these initiatives even if you are not doing regular hiring. When you do begin to hire you will have a pool of people from which to draw.

I) *Training Programs*
Employers can provide work stations or other training opportunities for clients of Vocational Rehabilitation Services, Workers' Compensation Board and the Canada Employment Centres. Wage incentives and some other costs are provided through these programs. Some employers have set up their own internship programs so that people with disabilities can gain job experience.

II) *Part-time/Temporary*
Temporary or part-time job opportunities may result from work overload, prolonged employee illness or leaves of absence that may require temporary recruitment from outside the organization. In many organizations, new hires often come from this pool of individuals. By making sure people with disabilities get some of these jobs you are increasing their chances of eventually getting hired by your organization. These temporary situations also present valuable learning opportunities around accessibility, policy and the like.

It may also be that people with certain types and/or degrees of disabilities may benefit from part-time job opportunities. For example, the occasional person may not have the stamina to work a full day. For others, an emotional or psychiatric disability may initially preclude a full time job because of stress factors.

III) *Summer Jobs*
You can make a point of seeking out young people with disabilities for some of your summer jobs. Colleges, universities and school boards all have services for students with disabilities. The coordinators of these services may be able to refer suitable candidates for your consideration.

IV) *Co-operative Education*
These temporary opportunities (usually half-days, alternating days, four months or eight months depending on whether they are secondary or post-secondary) may provide you with a chance to employ a skilled person who has a disability. The student receives a valuable work experience while your organization becomes used to the fact that persons with disabilities can participate in a meaningful way with your company. Both parties learn from this.

V) *Scholarships and Fellowships for Students with Disabilities*
By offering scholarships or fellowships with opportunities for related work experience during non-academic periods, employers can assist students with disabilities. In addition to providing assistance in particular fields of study, you are making a clear statement to those students contemplating a career choice.

Failure Traps

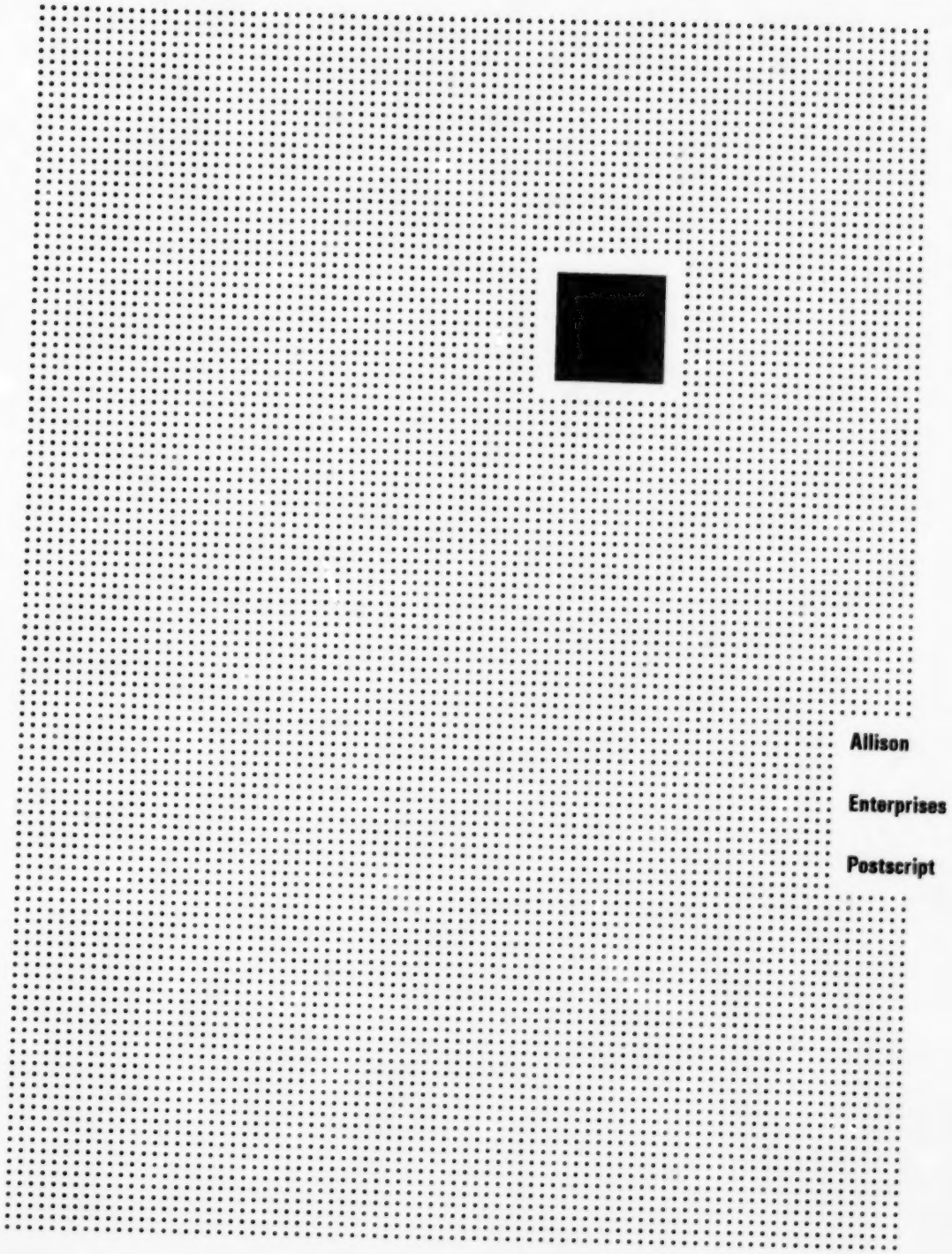
Anxious employers can undertake outreach efforts prematurely. They can have negative experiences as a result. Expectations are raised amongst employees and amongst disabled members of the community who are seeking employment. A breach of faith could hurt your later efforts if timed inappropriately.

A similar fate could await those who hire in order to satisfy numeric goals without consideration to skill and ability. In short, hiring someone who is disabled but not qualified in order to show commitment is dysfunctional.

It must be remembered that recruitment is both an action and a measurement method. Great care must be exercised in order that your action plan and your program are served well by the recruitment process.

Measurement Methods

- Positions identified.
- Candidates interviewed vs. hired.
- Temporary opportunities identified vs. placed.
- Internal promotions vs. external hires.


Allison
Enterprises
Postscript

At the outset of this document, the fictional Allison Enterprises addressed employment equity with good intentions but little success. The actions taken by the Director of Human Resources were not altogether inappropriate but rather, out of sequence and based on weak diagnosis of the organization's culture.

Several issues were identified that impeded the successful implementation of the program. These included timing, commitment, accommodation, objectives and diagnosis.

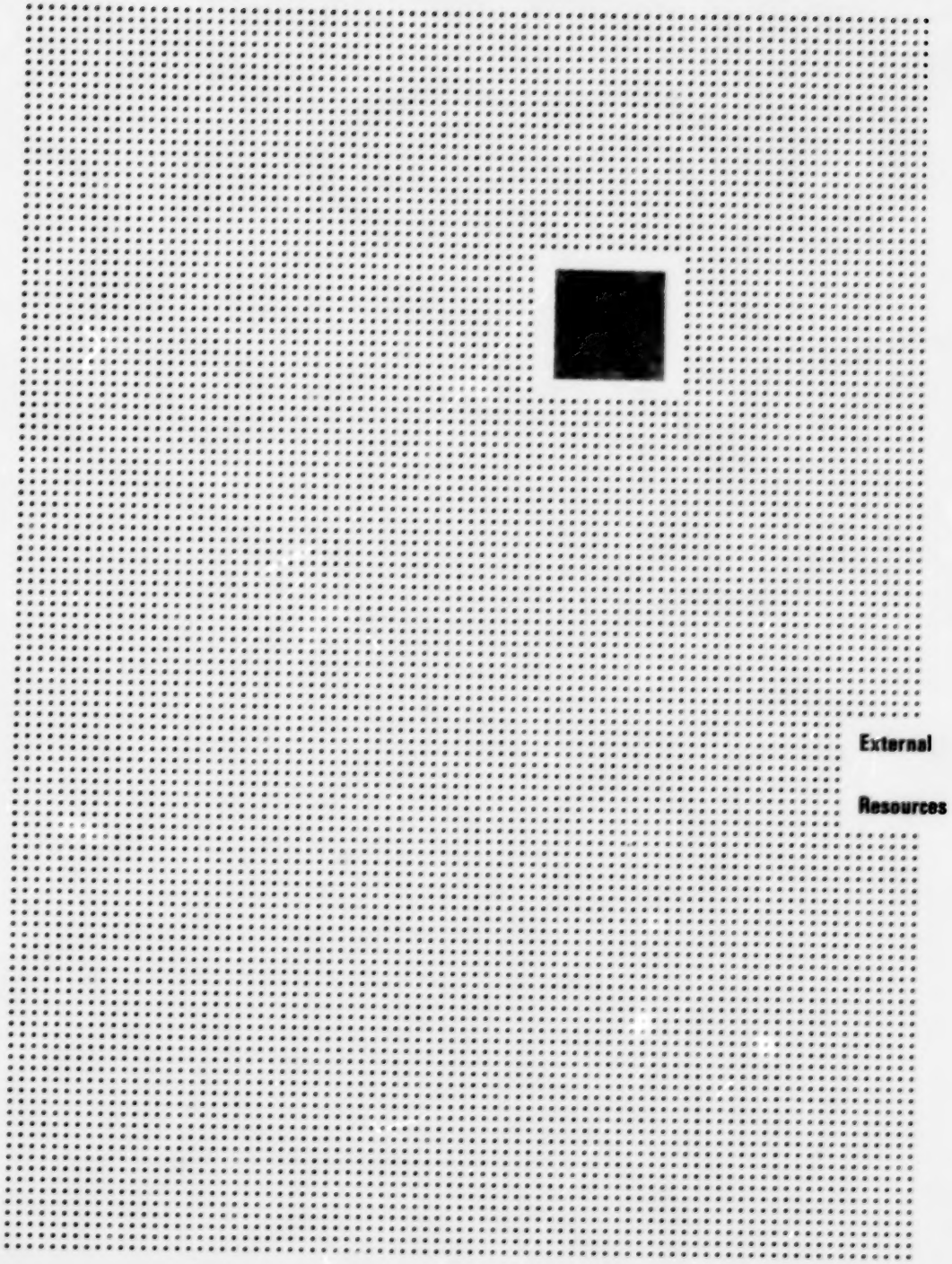
In reviewing the material that follows the case, several steps are identified that can assist Allison Enterprises.

Following the direction from the company President, the Director of Human Resources might have considered some or all of the following actions.

1. Establish an employee steering committee for the creation of an action plan. Include union representation if relevant. The Steering Committee to have responsibility for, or input into, the following steps.
2. Undertake diagnostic measures to determine if there is a problem and how to go about resolving it in an effective manner.
3. Establish an action plan with specific, time bound objectives with clear accountabilities and measurement methods.
4. Undertake to review policies and practices in the organization bearing in mind gaps that might exist and evidence of systemic discrimination.
5. Prepare an audit of representation in the workforce at Allison (including self-identification) and compare it to external data in order to analyse the current situation and define goals or objectives for the company's employment equity program.
6. Establish a process of ongoing communication with employees regarding goals and objectives as well as general action plan activities (i.e. provide the why and the how).
7. Undertake an awareness program that addresses all facets of your employment equity program. Make this program available to all employees in a variety of different methods.
8. Complete a facility review to determine where there may be a problem with accessibility and relate it to employees currently on staff who have mobility impairments. Prioritize other needs through a multi-year capital plan.
9. Develop a multi-faceted recruitment strategy, if appropriate, in order to communicate organization needs and solicit interest amongst applicants who have a disability.

These are but a few of the actions that could have been undertaken by Allison Enterprises to make their program more effective. Action could have included other strategies or steps included in this guide or may have included the items referred to above in a different order.

What remains is the realization that planning an employment equity program entails just that: planning in a comprehensive manner with adequate resources made available. It can make the difference between failing to meet expectations inside or outside your organization, or addressing employment equity in an effective manner.


External
Resources

Employment equity can be a complex subject to address in an organization. Many companies find it advantageous to seek external assistance from resource groups with expertise in one or more related areas.

Several such groups exist within the public and private sectors. When considering how to go about implementing a program suitable for your organization, you may wish to contact one of the groups listed in this chapter.

In order to facilitate easy reference, the information has been grouped to coincide with the format of this guide.

In some instances, the address provided for an agency is the main branch or Toronto office which could advise you of the office closest to your operation.

The list of agencies and organizations that follow is not to be considered an exhaustive one. There are many other groups operating across the province including agencies dedicated to serving specific disabilities. You are advised to contact the organization that you feel is most likely to serve your immediate need.

(416) 488-0030

Barrier Free Design Centre
150 Eglinton Ave. East
Suite 400
Toronto, Ontario
M4P 1E8

1 800 268-9243

Bell Canada — Telecommunication Centre for Special Needs
Bell — Trinity Square
North Tower – 1st Floor
483 Bay Street
Toronto, Ontario
M5G 2E1

(416) 964-6838

B.O.O.S.T.
(Blind Organization of Ontario with Self-Help Tactics)
597 Parliament Street
Suite B3
Toronto, Ontario
M4X 1W3

(519) 438-7235

Canadian Diabetes Association
Ontario Divisional Office
232 Central Avenue
London, Ontario
N6A 1M9

Consult the blue pages of your telephone book for the office nearest you.

Canada Employment Centre*

*See also "Outreach Projects" on page 52.

(416) 964-9595

Canadian Hearing Society
271 Spadina Rd.
Toronto, Ontario
M5R 2V3

(416) 973-5527

Canadian Human Rights Commission
55 St. Clair Avenue East, Rm. 623
Toronto, Ontario
M4T 1M2

(416) 486-2500

Canadian National Institute for the Blind
Ontario Division
1929 Bayview Avenue
Toronto, Ontario
M4G 3E8

(416) 422-5640

Canadian Paraplegic Association
520 Sutherland Drive
Toronto, Ontario
M4G 3V9

(416) 862-0340

Canadian Rehabilitation Council for the Disabled
One Yonge Street
Suite 2110
Toronto, Ontario
M5E 1E5

(416) 785-8797

Community Occupational Therapy Associates
3101 Bathurst Street, Suite 200
Toronto, Ontario
M6A 2A6

(416) 973-3755

Employment Equity Consulting Service
Canada Employment and Immigration Commission
264 Adelaide Street East
Main Floor
Toronto, Ontario
M5A 1N1

(416) 229-2291

Epilepsy Ontario
Regional Office
5385 Yonge Street
Suite 207
Willowdale, Ontario
M2N 5R7

(416) 965-2321

Handicapped Employment Program (H.E.P.)
Ontario Ministry of Labour
400 University Avenue
10th Floor
Toronto, Ontario
M7A 1T7

(416) 868-1001

Low Vision Association
145 Adelaide Street West
4th Floor
Toronto, Ontario
M5H 3H4

(416) 922-6065

Multiple Sclerosis Society of Canada
National, Regional and Toronto Office
250 Bloor Street East
Suite 820
Toronto, Ontario
M4W 3P9

Consult the blue pages of your telephone book for the office nearest you.

National Film Board of Canada

(705) 474-3851

North Bay and Area Centre for the Disabled
409 Main Street
P.O. Box 137
North Bay, Ontario
P1B 8G8

(416) 699-3192

On Our Own
Ontario Patients' Self-Help Association
1860A Queen Street East
Box 7251, Station A
Toronto, Ontario
M5W 1X9

(416) 483-4348

Ontario Association for the Mentally Retarded
1376 Bayview Avenue
Toronto, Ontario
M4G 3A3

(416) 487-4107

Ontario Association of Children and Adults with Learning Disabilities (OACALD)
1901 Yonge Street
Suite 504
Toronto, Ontario
M4S 2Z3

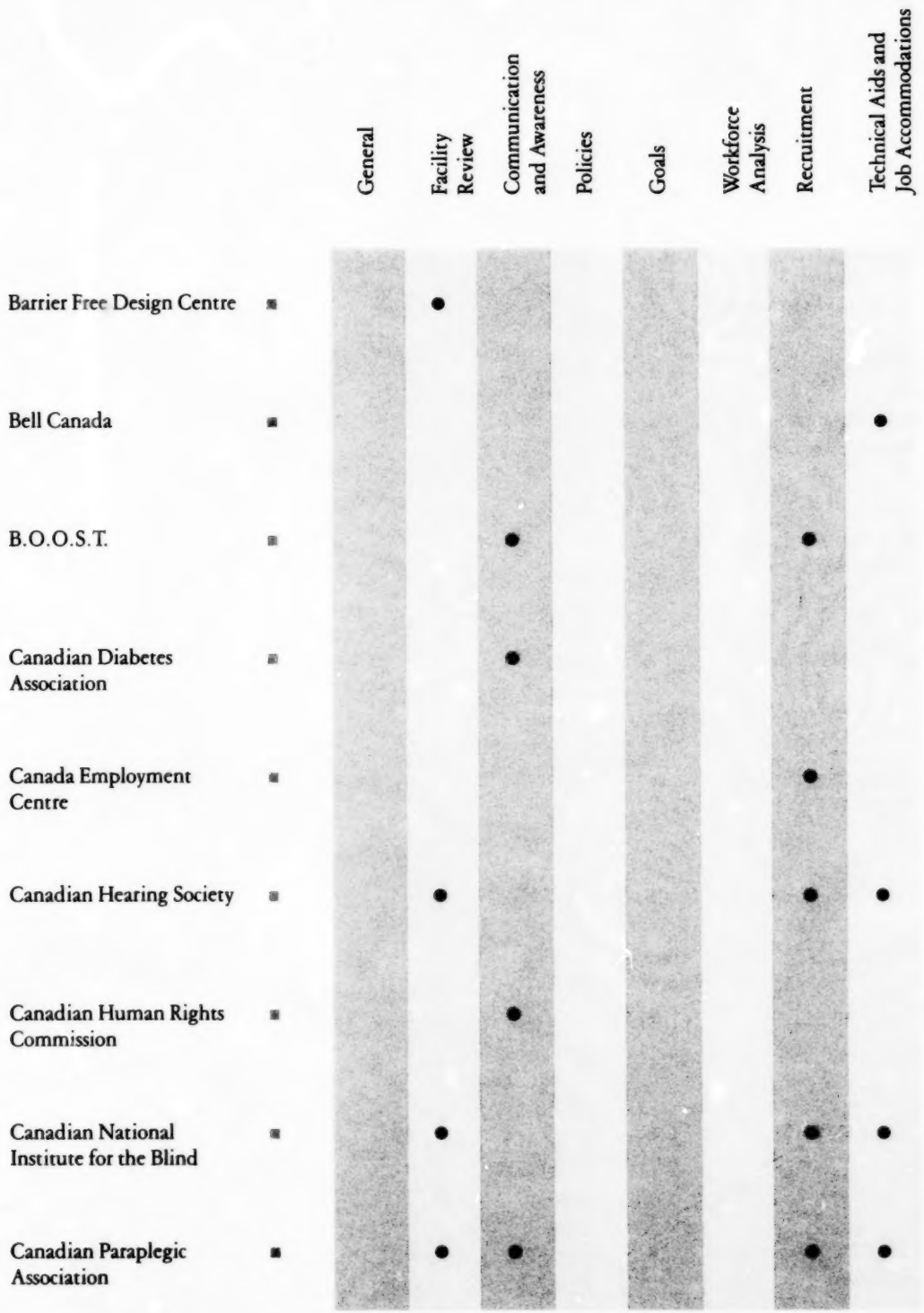
(416) 787-4595

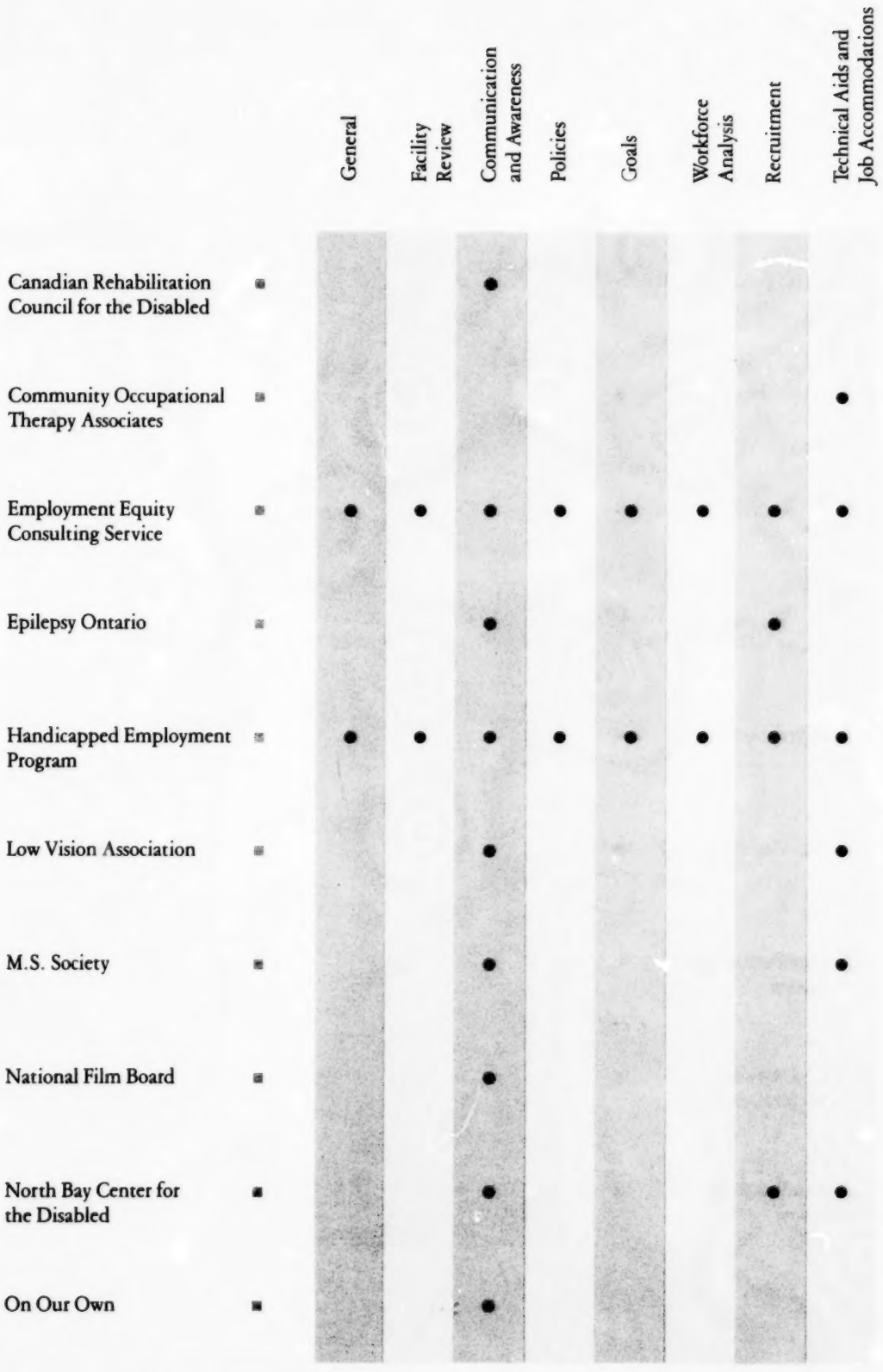
Ontario Federation for the Cerebral Palsied
Headquarters
1020 Lawrence Avenue West
Suite 303
Toronto, Ontario
M6A 1C8

(416) 441-2731

Ontario Federation of Labour
15 Gervais Drive
Don Mills, Ontario
M3C 1Y8

Consult the blue pages of your telephone book for the office nearest you.	Ontario Human Rights Commission
(416) 425-0501	Ontario March of Dimes 60 Overlea Boulevard Toronto, Ontario M4H 1B6
(416) 923-6725 TDD: 923-6210	PUSH Ontario (Persons United for Self-Help in Ontario) Provincial Office 597 Parliament Street Suite 204 Toronto, Ontario M4X 1W3
(416) 475-2212	TASH Inc. (Technical Aids and Systems for the Handicapped) 70 Gibson Drive Unit 1 Markham, Ontario L3R 2Z3
Consult the blue pages of your telephone book for the office nearest you.	Vocational Rehabilitation Services (V.R.S.) (Ontario Ministry of Community and Social Services)
Consult the blue pages of your telephone book for the office nearest you.	Workers' Compensation Board


General
Facility Review
Communication and Awareness
Policies
Goals
Workforce Analysis
Recruitment
Technical Aids and Job Accommodations
Barrier Free Design Centre
Bell Canada
B.O.O.S.T.
Canadian Diabetes Association
Canada Employment Centre
Canadian Hearing Society
Canadian Human Rights Commission
Canadian National Institute for the Blind
Canadian Paraplegic Association


General
Facility Review
Communication and Awareness
Policies
Goals
Workforce Analysis
Recruitment
Technical Aids and Job Accommodations
Canadian Rehabilitation Council for the Disabled
Community Occupational Therapy Associates
Employment Equity Consulting Service
Epilepsy Ontario
Handicapped Employment Program
Low Vision Association
M.S. Society
National Film Board
North Bay Center for the Disabled
On Our Own

	General	Facility Review	Communication and Awareness	Policies	Goals	Workforce Analysis	Recruitment	Technical Aids and Job Accommodations
Ontario Assoc. for the Mentally Retarded			●				●	●
Ontario Assoc. of Children and Adults with Learning Disabilities			●					●
Ontario Federation for the Cerebral Palsied			●					●
Ontario Federation of Labour			●					
Ontario Human Rights Commission			●	●	●	●	●	●
Ontario March of Dimes		●	●				●	●
PUSH – Ontario			●					
TASH Inc.								●
Vocational Rehabilitation Services		●					●	●
Workers' Compensation Board		●					●	●

Outreach Projects

In addition to the foregoing resources Employment and Immigration Canada funds various outreach projects intended to find jobs for people with disabilities. These include:

Toronto

(416) 787-1151

Project Job Search
Jewish Vocational Services
74 Tycos Drive
Toronto, Ontario
M6B 1V9

(416) 486-1623

CNIB Outreach – Toronto
1929 Bayview Avenue
Toronto, Ontario
M4G 3E8

(416) 363-4011

STEPS — Epilepsy Association
80 Richmond Street West
Suite 804
Toronto, Ontario
M5H 2A4

(416) 964-9595

Job Placement for the Hearing Impaired
271 Spadina Road
Toronto, Ontario
M5R 2V3

(416) 422-5640

ADEPT Assistance to the Disabled in Employment and Placement Training – Toronto
520 Sutherland Drive
Toronto, Ontario
M4G 3V9

Other Cities

(416) 545-3475

Path Employment Services
350 Kenilworth Avenue North
Hamilton, Ontario
L8H 4T3

(705) 267-2183

March of Dimes
841 Pine Street South
Timmins, Ontario
P4N 7H9

(613) 238-8422

Line 1000
160 Chapel Street
Ottawa, Ontario
K1N 8P5

(705) 949-1699

March of Dimes
Sault Ste. Marie Regional Office
180 Gore Street
Sault Ste. Marie, Ontario
P6A 1M2

ISBN: 0-77291885-6